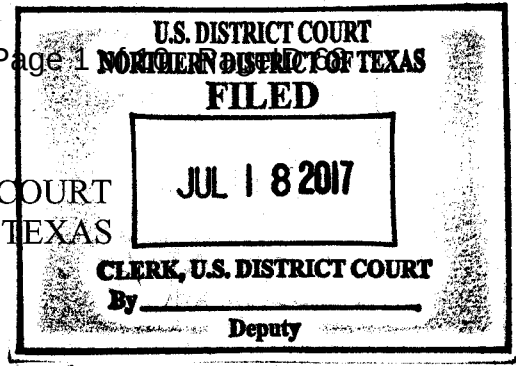


ORIGINAL



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:17-MJ-589

DUSTIN RAY BELL	(01)
TROY DEWAYNE BELL	(02)
MICHAEL CHEEK BRABSON	
a/k/a "Madman"	(03)
JUSTIN ARNOLD CASTRO	(04)
KARRISSA MARIE GLENN	(05)
RICHARD LOUIS KRASE	
a/k/a "Krazy Kraze"	
a/k/a "Sean Haas"	(06)
ANGEL RENEE NORRIS	(07)
ELIUD SERNA JR.	
a/k/a "Junior Serna"	(08)

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2014, and continuing until on or about April 28, 2017, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Dustin Ray BELL**, **Troy Dewayne BELL**, **Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO**, **Karrissa Marie GLENN**, **Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean Haas, **Angel Renee NORRIS**, **Eliud SERNA Jr.**, also known as Junior Serna, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 18 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.

2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine,

the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Dustin Ray BELL, Troy Dewayne BELL, Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO, Karrissa Marie GLENN, Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean Haas, **Angel Renee NORRIS, Eliud SERNA Jr.**, along with Rachel Adams, Travis Cathey, Melissa Veatch, Jonathan Ruckman, and Michael Stepich, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Dustin Ray BELL, Troy Dewayne BELL, Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO, Karrissa Marie GLENN, Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean

Haas, **Angel Renee NORRIS, Eliud SERNA Jr.**, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Dustin Ray BELL, Troy Dewayne BELL, Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO, Karrissa Marie GLENN, Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean Haas, **Angel Renee NORRIS, Eliud SERNA Jr.**, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, Rachel Adams, Travis Cathey, Melissa Veatch, Jonathan Ruckman, Michael Stepich,, and others distributed or brokered methamphetamine transactions between and **Dustin Ray BELL, Troy Dewayne BELL, Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO, Karrissa Marie GLENN, Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean Haas, **Angel Renee NORRIS, Eliud SERNA Jr.**, and others.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On October 14, 2014, Officers with the Fort Worth Police Department arrested **Michael BRABSON**.
- b. On June 15, 2015, Agents/Officers with the Drug Enforcement Administration (DEA) arrest Rachel Adams.

12. Co-conspirator Lee Baker identified **Dustin Ray BELL** as a methamphetamine distributor whom he (Baker) had witnessed in possession of one (1) ounce of methamphetamine on more than ten (10) occasions. Baker stated that he (Baker) had witnessed **Dustin Ray BELL** distribute ounce and multi ounce quantities of methamphetamine on approximately five (5) occasions, and between an eighth (1/8) and half (1/2) ounce of methamphetamine on approximately twenty (20) occasions to multiple customers. Additionally, Baker stated that he had witnessed **Dustin Ray BELL** distribute between an eighth (1/8) and a sixteenth (1/16) ounce of methamphetamine to his brother **Troy Dewayne BELL** on two (2) to three (3) occasions. Baker stated that he had witnessed **Troy Dewayne BELL** in possession of between an eighth (1/8) and a quarter (1/4) ounce of methamphetamine on three (3) additional occasions. Co-conspirator Jonathan Ruckman confirmed that **Dustin Ray BELL** was involved in distributing methamphetamine. Specifically, Ruckman said that **Dustin Ray BELL** was one of his (Ruckman's) methamphetamine sources of supply in 2015. Ruckman stated that **Karrissa Marie GLENN** accompanied **Dustin Ray BELL** on most of their transactions and that he (Ruckman) dealt with **Dustin Ray BELL** until the time of his (**Dustin Ray**

BELL's) arrest. Specifically, Ruckman stated that on at least fifteen (15) or twenty (20) occasions, he (Ruckman) purchased one (1) ounce of methamphetamine from **Dustin Ray BELL**. Co-Conspirator Mandy Turner confirmed that **Troy Dewayne BELL** was involved in distributing methamphetamine. Specifically, Turner stated that she (Turner) witnessed **Troy Dewayne BELL** weighing between three (3) and four (4) ounce quantities of methamphetamine on five (5) occasions, and one (1) and two (2) ounces of methamphetamine on three (3) additional occasions. Co-conspirator Lauren Moore identified **Troy Dewayne BELL** as a methamphetamine distributor whom she (Moore) had witnessed in possession of three (3) ounces of methamphetamine on one (1) occasion. Moore stated that she (Moore) had obtained a quarter ($\frac{1}{4}$) ounce of methamphetamine on one (1) occasion from **Troy Dewayne BELL**. Moore stated that she had witnessed **Troy Dewayne BELL** deliver an eighth ($\frac{1}{8}$) ounce of methamphetamine on one (1) occasion. Moore also stated that she (Moore) had witnessed **Troy Dewayne BELL** in possession of a half ($\frac{1}{2}$) ounce of methamphetamine on two (2) occasions. Additionally, Moore identified **Dustin Ray BELL** and **GLENN** as methamphetamine distributors whom she had witnessed distribute a quarter ($\frac{1}{4}$) ounce of methamphetamine on one (1) occasion to Katherine Markle at the Vickery Motel. Moore stated that she witnessed **Dustin Ray BELL** and **GLENN** in possession of one and a half ($1\frac{1}{2}$) ounces of methamphetamine on the same occasion.

13. Co-conspirator Leslie Payne identified **Michael Cheek BRABSON** as a methamphetamine distributor. Payne stated that she had witnessed **BRABSON** in possession of sixteen (16) ounces of methamphetamine on two (2) occasions, eight (8) ounces of methamphetamine on four (4) to five (5) occasions, and four (4) ounces of methamphetamine on two (2) occasions in 2014. Payne stated that she had obtained two (2) ounces of methamphetamine on one (1) occasion and one (1) ounce of methamphetamine on five (5) occasions from **BRABSON** in 2014. Co-conspirator Michael Stepich confirmed that **BRABSON** was involved in distributing methamphetamine. Specifically, Stepich stated that he (Stepich) knew that based on working for and delivering methamphetamine for Rachel Adams, that after being taken into Federal Custody on a gun case in 2014, **BRABSON** directed Rachel Adams to begin purchasing methamphetamine from his (**BRABSON's**) methamphetamine source of supply, identified as Samuel Hebert. Agents/Officers confirmed Stepich's statements by listening to **BRABSON's** recorded jail calls from the time he (**BRABSON**) was incarcerated at the Parker County Jail. Specifically, Agents/Officers identified a phone call between **BRABSON** and Rachel Adams where **BRABSON** directed Rachel Adams to begin purchasing methamphetamine from his (**BRABSON's**) methamphetamine source of supply.

14. Co-conspirator Travis Cathey identified **Justin Arnold CASTRO** as a methamphetamine distributor. Cathey stated that on six (6) to seven (7) occasions he (Cathey) delivered four (4) to eight (8) ounces of methamphetamine to **CASTRO** at the

direction of Rachel Adams. Co-conspirator Brian Brown identified **CASTRO** as a methamphetamine customer of Travis Cathey. Brown stated that he (Brown) had witnessed Cathey distribute multi ounce quantities of methamphetamine on two (2) to three (3) occasions to **CASTRO**. Co-conspirator Melissa Veatch confirmed that **CASTRO** was involved in distributing methamphetamine. Specifically, Veatch stated that she (Veatch) had on multiple occasions, supplied **CASTRO** with pound quantities of methamphetamine.

15. Co-conspirator Shanda Hawkins identified **Richard Louis KRASE** as a methamphetamine distributor and a runner for Rachel Adams. Hawkins stated that she (Hawkins) had had witnessed **KRASE** and Adams in possession of one (1) kilogram of methamphetamine each day for a six (6) week period. Hawkins stated that she (Hawkins) had delivered two (2) ounces of methamphetamine on two (2) occasions to **KRASE**. Hawkins stated that **KRASE** frequently carried a handgun. Co-conspirator Michael Stepich confirmed that **KRASE** was involved in distributing methamphetamine. Specifically, Stepich stated that on four (4) or five (5) occasions, he (Stepich) observed **KRASE** in possession of three (3) or four (4) ounce quantities of methamphetamine that Stepich knew had been supplied to **KRASE** by Rachel Adams.

16. Co-conspirator Leslie Payne identified **Eliud SERNA Jr.** as a methamphetamine distributor whom she (Payne) had witnessed in possession of four (4) ounces of methamphetamine on two (2) occasions, two (2) ounces of methamphetamine on six (6) occasions, and one (1) ounce of methamphetamine on two (2) occasions in 2015.

Payne also stated that she had distributed a half ($\frac{1}{2}$) ounce of methamphetamine on five (5) occasions, one (1) ounce of methamphetamine on two (2) occasions, and two (2) ounces of methamphetamine on six (6) occasions to **SERNA**. Payne stated she (Payne) had distributed one (1) ounce of methamphetamine on three (3) occasions and a half ($\frac{1}{2}$) ounce of methamphetamine on one (1) occasion to **SERNA**. Additionally, Payne stated that on multiple occasions she (Payne) observed **SERNA** "post up" at local game rooms and distribute methamphetamine to multiple customers. Co-conspirator Alisha Priest confirmed that **SERNA** was involved in distributing methamphetamine. Specifically, Priest said that she (Payne) had witnessed Eloy Salas and **SERNA** in possession of eight (8) ounces of methamphetamine on two (2) occasions in 2015.

17. Co-conspirator Lee Baker identified **Angel Renee Norris** as a methamphetamine distributor whom he (Baker) had witnessed **Dustin Bell** distribute between a quarter ($\frac{1}{4}$) and a half ($\frac{1}{2}$) ounce of methamphetamine to **Norris** on more than five (5) occasions. Baker stated that he had also witnessed **Norris** obtain four (4) ounces of methamphetamine on three (3) occasions from Laci Whisenant. Co-conspirator Michael Stepich confirmed that **Norris** was involved in distributing methamphetamine. Specifically, Stepich said that he (Stepich) has seen **Norris** with three (3) ounces of methamphetamine on one (1) occasion, two (2) ounces of methamphetamine on two (2) occasions, and one (1) ounce of methamphetamine on ten (10) to fifteen (15) occasions. Stepich then stated that he (Stepich) had sold **Norris** one quarter ($\frac{1}{4}$) ounce of methamphetamine on approximately one (1) occasion.

18. Based on the foregoing, the Complainant believes that probable cause exists that **Dustin Ray BELL, Troy Dewayne BELL, Michael Cheek BRABSON**, also known as Madman, **Justin Arnold CASTRO, Karrissa Marie GLENN, Richard Louis KRASE**, also known as Krazy Kraze, also known as Sean Haas, **Angel Renee NORRIS, Eliud SERNA Jr.** along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 9:03⁰⁰ pm, this 18th day of July 2017, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge